

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

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TargetPath, LLC,

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Plaintiff,

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Case No. 24-cv-01305 T MRS

\*

v.

\*

THE UNITED STATES,

\*

Defendant.

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**UNOPPOSED MOTION TO UNSEAL THE REDACTED VERSION OF THE  
COMPLAINT AND ACCOMPANYING EXHIBITS**

Plaintiff TargetPath, LLC, by counsel, respectfully requests that the Court unseal the proposed redacted version of the Complaint and accompanying Exhibits (ECF No. 2), stating as follows:

1. On August 23, 2024, Plaintiff filed its Complaint, pleading a claim for tax refund. ECF No. 1.
2. Plaintiff attached to its Complaint a proposed redacted version of the Complaint and accompanying Exhibits (ECF No. 2) and a motion to file under seal an unredacted version of the Complaint and all accompanying exhibits (ECF No. 3).
3. The unredacted (ECF No. 1) and proposed redacted (ECF No. 2) versions of Plaintiff's Complaint and accompanying exhibits are currently both under seal.
4. On September 24, 2024, Plaintiff conferred with counsel for the United States, who indicated that the United States does not oppose this motion to unseal the proposed redacted version of Plaintiff's Complaint and accompanying exhibits.

WHEREFORE, Plaintiff respectfully requests that the Court enter an order unsealing the proposed redacted version of Plaintiff's Complaint and accompanying exhibits.

Dated: September 24, 2024

Respectfully submitted,

VENABLE LLP

/s/ Christopher N. Moran

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